Comments of The United Illuminating Company Re:

Proposed Senate Bill 200
AN ACT ESTABLISHING GEOTHERMAL RENEWABLE ENERGY CREDITS

Proposed Senate Bill 255
AN ACT CONCERNING SOLAR RENEWABLE ENERGY CERTIFICATES

Proposed Senate Bill 634
AN ACT CONCERNING FARM METHANE RESOURCES

Proposed House Bill 5846
AN ACT CONCERNING ENERGY GENERATION FROM ORGANIC REFUSE
Before the Energy & Technology Committee

Legislative Office Building February 10, 2011

The United Illuminating Company (UI) hereby provides general comments on the four proposed bills listed above. As an overarching comment on all four bills, UI does not believe that it is good public policy to pick winners and losers among renewable energy technologies. Connecticut already has one of the most robust renewable portfolio standards (RPS) in the country. One of the best things about the current structure of Connecticut's RPS is that it allows competition to determine which renewable energy resources provide renewable certificates to customers. This competition provides assurance to Connecticut's customers that the RPS will be met at the lowest possible cost.

Proposed Senate Bills 200, 255 and 634 all pick winners and losers among renewable technologies by providing for technology-specific subsidies at the expense of electric customers in the State. Only Proposed House Bill 5846 takes a more measured approach by establishing a pilot program to test the commercial viability of a particular technology.

All four of the renewable technologies discussed in the bills either qualify as Class I renewable resources under Connecticut's RPS, or should qualify based on the comparability of these technologies to other Class I renewable technologies. To the extent that any of these technologies does not qualify, as appears to be the case with geothermal energy, then UI believes that it would be appropriate to amend Connecticut's RPS to include them as Class I resources.

If you have any questions concerning these comments, please contact Carlos Vazquez, UIL's Senior Director of Government Relations, at (203) 499-2825 or 203-521-2455.